REMARKS

This paper is responsive to an Office Action dated June 29, 2004. Prior to this response claims 1-17 were pending. After amending claims 1, 4, 6-7, 9, and 12, claims 1-17 remain pending.

In Section 3 of the Office Action claims 1-17 have been rejected under 35 U.S.C. 112, second paragraph as being indefinite. The Office Action states that "(t)he claim scope is uncertain since the trademark or trade name cannot be used to identify any particular material or product." More specifically, the Office action objects to the phrases "HAVi specification protocols", "HEventRepresentation", and "HAVi level 2". In response, the claims have been amended to delete any recitation of "HAVi" and "HEventRepresentation" terms.

In Section 5 of the Office Action claims 1-4, 7-8, and 12-14 are rejected under 35 U.S.C. 101 as being directed to non-statutory subject matter. More specifically, the Office Action states that the method is not tangibly embodied. In response, claims 1, 7, and 12 have been amended to more clearly recite the methods as steps performed by a device. The tangible result performed by the device(s) of claims 1, 7, and 12 involves the definition and use of user interface buttons. The Applicant respectfully submits that claims 1, 7, and 12 describe a useful process that produces a "useful, concrete, and tangible result." *State Street*, 149 F.3d at 1373, 47 USPQ2d at 1601-1602. Claims 2-4, dependent from claim 1, claim 8, dependent from claim 7, and claims 13-14, dependent from claim 12, should now also be allowable.

In Section 7 of the Office Action claims 1-17 have been rejected under 35 U.S.C. 102(e) as being anticipated by HAVi Specification Version 1.1, 5-2001 ("HAVi"). With respect to claim 1, the Office Action states that HAVi discloses the retrieval of virtual key information in response to accessing a JAR file (Section 8.3.2.5, page 429). Section 2.5.2 is referenced to L2, and Section 7.4 is referenced to JAR files. With respect to claim 7, the Office Action states that HAVi discloses the retrieval of virtual key information in response to accessing a ResourceBundle (page 429). Section 2.5.2 is referenced to L2, and 8.3.2.4 to input capabilities. With respect to claim 12, the Office Action states that HAVi discloses the retrieval of virtual key information in response to accessing a mapped memory (page 429). Section 2.5.2 is referenced to L2, 7.4 to code units, 8.1 to the L2 UI, 8.7 and 8.8 to Java applications, and 9.4 and 9.5 to the HAVi unit directory. This rejection is traversed as follows.

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987).

HAVi Section 2.5.2 states that the L2 UI is based upon JAVA AWT 1.1. Section 7.4 states that JAVA code units are entities for uploading, and that the format of a JAVA code unit is the JAR format. Details are given of DCM, AMC, and Havlet code units. Section 8.1 describes the HAVi UI. Section 8.1.1 notes that "a large number of events are optional, allowing manufacturers to customize and add value to their products." Section 8.3.2.4 states that there are three classes available to determine if a device is available. Section 8.7 describes a general

approach to error behavior. Section 8.8 is a list of constants. Section 9.4 presents a list of defined HAVi key values. Section 9.5 lists HAVi and non-HAVi ROM requirements.

Section 8.3.2.5 (page 429) of the HAVi specification states that an event can have a representation as a string, color, or symbol, which can be determined by calling *get*String, *get*Color, and *get*Symbol, respectively. This methodology permits the definition of a device button. However, HAVi Section 8.3.2.5 does not teach how the virtual key information is to be stored or retrieved from memory.

Claim 1 recites the retrieval of virtual key information in response to accessing a JAR file stored in memory. HAVi 7.4 and 8.3.2.5 do not teach the access of virtual key information from a JAR file. Claim 7 recites the retrieval of virtual key information in response to accessing a ResourceBundle. HAVi 8.3.2.4 and 8.3.2.5 do not teach the retrieval of virtual key information in response to accessing a ResourceBundle. Claim 12 recites the retrieval of virtual key information in response using a JNI to access a mapped memory. HAVi 7.4, 8.7, 8.8, 9.4, 9.5, and 8.3.2.5 do not teach the use of a JNI to access mapped memory, to retrieve virtual key information. Since HAVi does not explicitly describe all the elements of claims 1, 7, and 12, it cannot anticipate. Claims 2-6, dependent from claim 1, claims 8-11, dependent from claim 7, and claims 13-17, dependent from claim 12, enjoy the same distinctions from the cited prior art. The Applicant respectfully requests that the rejections be removed.

It is believed that the application is in condition for allowance and reconsideration is earnestly solicited.

Respectfully submitted,

Date: 9/9/04

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